

**IN UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SIGNAZON CORP., d/b/a
SIGNAZON.COM

Plaintiff,

v.

FIRST GRAPHIC SERVICES, INC., and
RICHARD D. CARTWRIGHT,

Defendants.

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CIVIL ACTION NO. 3:20-cv-3432

JURY TRIAL DEMANDED

AGREED MOTION TO EXTEND TIME

Plaintiff Signazon Corp. d/b/a Signazon.com (“Plaintiff” and/or “Signazon”) hereby files this Agreed Motion to Extend Time pursuant to Rule 6 of the Federal Rules of Civil Procedure, and moves the Court for an order to extend the time for Defendants First Graphic Services, Inc. and Richard D. Cartwright (collectively, “Defendants” and/or the “FGS Parties”) to file an answer or otherwise plead in the above-titled action. In support hereof, Plaintiff shows the following:

1. On or about November 17, 2020, Plaintiff filed its Original Complaint For Copyright Infringement (the “Complaint”) against the FGS Parties asserting various claims for copyright infringement.
2. The FGS Parties were served with the Complaint on November 24, 2020.
3. Defendants’ deadline to file an answer or other responsive pleading is on or before December 15, 2020. Accordingly, the time for filing an answer or other pleading has not yet expired.
4. Counsel for Plaintiff has conferred with Counsel for Defendants (who has not yet entered an appearance in this matter) and agreed that an extension of time to respond is appropriate for several reasons: 1) the parties would like additional time to fully explore whether a resolution

of this matter is possible without the need for further judicial intervention; and 2) Counsel for Defendants need additional time to prepare a response due to impending deadlines in other matters for other clients and the interceding Thanksgiving holiday immediately following service on Defendants.

5. More specifically, Plaintiff requests that Defendants' deadline to file a response to the Complaint be extended until and including January 15, 2021.

6. This Motion to Extend Time is not being made for the purpose of delay, and no party will be prejudiced by the extension of time because the case is only in its initial stages.

7. The extension is requested in good faith and so that justice may be served.

8. This Motion to Extend Time is being filed as soon as the parties became aware of the need for additional time.

9. Plaintiff and Defendants are not opposed and agree to the relief requested herein.

10. For these reasons, Plaintiff asks the Court to extend the time for Defendants to file an answer or otherwise plead in response to the Complaint until and including January 15, 2021.

Dated: December 9, 2020

Respectfully submitted,

/s/ Rajkumar Vinnakota
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**ATTORNEYS FOR PLAINTIFF
SIGNAZON CORP.**

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that Counsel for Plaintiff and Counsel for Defendants conferred on December 9, 2020 regarding the matters set forth in this Motion. Counsel agreed to the relief requested, and the Motion is submitted to the Court as agreed.

/s/ Rajkumar Vinnakota
Rajkumar Vinnakota

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via email on December 9, 2020.

/s/ Rajkumar Vinnakota
Rajkumar Vinnakota